Type:	Policy Summary
Name:	Anti Money Laundering – Countering Financing of Terrorism Policy
Key search terms:	Anti-Money Laundering / Counter Terrorism Financing / Sanctions / Regulatory Compliance / Financial Crime Risk

1. Policy Statement

The Bank commits to maintaining a robust and proactive framework for managing Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Sanctions risk. This Policy forms part of the CABS Governance Framework and establishes the Bank's binding commitments for managing financial crime risk at the highest standard.

We shall implement and continuously strengthen the controls, processes, and systems necessary to detect, prevent, and report Money Laundering, Terrorism Financing, and Sanctions violations. The Bank commits to full compliance with all applicable laws and regulations including the Money Laundering and Proceeds of Crime Act and acknowledges that regulatory compliance risk exists independently of underlying financial crime risk and must be managed accordingly.

CABS commits to addressing both the operational and regulatory dimensions of AML, CFT, and Sanctions risk with equal rigour, ensuring that no gap exists between the Bank's legal obligations and its internal control environment.

2. Purpose of the Policy

This Policy exists to protect CABS, its clients, and the integrity of the financial system from the harmful consequences of money laundering, terrorism financing, and sanctions breaches. Financial crime erodes public trust, destabilises institutions, and facilitates serious harm. By establishing a consistent, structured approach to identifying, managing, and mitigating these risks, the Bank ensures that its operations are never knowingly used as a conduit for illicit activity. The Policy achieves this by mandating adequate controls across all business units, promoting continuous regulatory alignment, and enabling the timely identification and escalation of financial crime risks before they result in regulatory sanction, reputational damage, or financial loss.

Type:	Policy Summary
Name:	Climate Risk Policy
Key search terms:	Climate Risk / Sustainability / ESG / Physical Risk / Transition Risk / Environmental Risk

1. Policy Statement

The Bank commits to proactively identifying, assessing, and managing Climate Risk as a material financial and operational risk. CABS recognises that both physical risks, arising from extreme weather events and long-term environmental changes, and transition risks, arising from the shift to a low-carbon economy, have the potential to affect the Bank's operations, lending portfolio, and long-term financial stability.

We shall integrate climate-related considerations into our strategic planning, risk management processes, and business decisions. The Bank commits to supporting the transition to a climate-resilient and low-carbon economy, aligning our operations and investment activities with sustainability objectives while safeguarding financial performance and institutional reputation. This Policy operates within CABS' broader sustainability framework and is subordinate to the Environmental, Social and Governance (ESG) Policy.

2. Purpose of the Policy

This Policy exists because climate change presents real and growing financial risks to CABS and the clients and sectors it serves. Ignoring climate risk exposes the Bank to unexpected credit losses, stranded assets, operational disruptions, and regulatory non-compliance. By embedding climate risk management into the Bank's governance and decision-making, CABS ensures it can anticipate, measure, and respond to climate-related financial impacts before they crystallise.

The Policy achieves this by establishing CABS-wide principles for climate risk identification and assessment, integrating physical and transition risk considerations into lending and investment decisions, and supporting the progressive alignment of business activities with sustainability and ESG commitments.

Type:	Policy Summary
Name:	CABS Regulatory Compliance Risk Policy
Key search terms:	Compliance Risk / Regulatory Risk / Legal Risk / Governance / Oversight / Accountability / Risk Management

1. Policy Statement

The Bank commits to operating in full and consistent adherence with all applicable laws, regulations, and internal standards. CABS recognises that regulatory compliance is not merely a legal obligation it is the foundation upon which stakeholder trust, institutional integrity, and sustainable business operations are built.

We shall embed a strong compliance culture across the organisation, where regulatory requirements are understood, applied, and monitored at every level. The Bank commits to proactively identifying and managing regulatory risks, ensuring that non-compliance is treated with the seriousness it warrants and addressed swiftly through appropriate remedial action.

All employees, directors, agents, contractors, and third parties acting on behalf of CABS are required to act with honesty, integrity, and ethical conduct in all professional activities.

2. Purpose of the Policy

This Policy exists to protect CABS from the legal, financial, and reputational consequences of regulatory non-compliance. In a complex and evolving regulatory environment, the absence of a structured compliance framework creates unacceptable exposure to sanctions, financial penalties, and loss of operating authorisation. By establishing a consistent, organisation-wide approach to compliance risk management, the Bank ensures it can identify regulatory gaps early and respond decisively.

The Policy achieves this by embedding compliance into business processes and decision-making, establishing clear escalation and remediation mechanisms, and ensuring that regulatory developments are continuously monitored and reflected in the Bank's policies, procedures, and controls.

Type:	Policy Summary
Name:	Anti-Bribery & Corruption Standard
Key search terms:	Bribery / Corruption / Ethics / Gifts and Hospitality / Financial Crime / Compliance

1. Policy Statement

The Bank commits to maintaining zero tolerance for bribery and corruption in all its forms. CABS regards bribery and corruption as fundamental threats to institutional integrity, regulatory standing, and public trust. We shall implement robust controls to prevent, detect, and respond to any form of corrupt conduct across our operations.

We commit to identifying, assessing, and managing bribery and corruption risks through a structured governance and control framework aligned with the National Anti-Corruption Strategy and applicable regulatory requirements. The Bank further commits to ensuring that the giving and receiving of corporate gifts and hospitality is transparent, appropriately governed, and free from any improper influence or conflict of interest.

2. Purpose of the Policy

This Policy exists to safeguard CABS from the legal, regulatory, and reputational harm that bribery and corruption invariably cause. Corrupt conduct undermines sound governance, distorts business decisions, and exposes the institution and individuals to prosecution and significant financial penalties. By establishing clear principles and minimum standards for managing bribery and corruption risk, the Bank ensures that all business is conducted with integrity and in full compliance with applicable law.

The Policy achieves this by defining consistent standards for anti-bribery and corruption risk management across all business units, establishing governance requirements for gifts and hospitality, and ensuring that appropriate controls are in place to prevent corrupt conduct before it occurs, and to detect and remediate it if it does.

Type:	Policy Summary
Name:	CABS Code of Ethics
Key search terms:	Ethics / Integrity / Conduct / Governance / Values / Culture

1. Policy Statement

The Bank commits to conducting all business activities with the highest standards of integrity, ethical behaviour, and professionalism. The CABS Code of Ethics reflects the Bank's unwavering commitment the highest ethical standards in every transaction, every client interaction, and every organisational decision.

We shall foster and sustain a culture in which ethical standards are clearly defined, consistently applied, and continuously reinforced across all levels of the organisation. The Bank commits to transparency, accountability, and responsible conduct as core operating principles, underpinned by our values of respect, integrity, trust, diversity and inclusion, agile innovation, and a strong focus on championing the customer.

CABS has zero tolerance for unethical, dishonest, or unlawful behaviour. All employees, directors, contractors, and associated persons are expected to uphold the highest standards of personal and professional integrity.

2. Purpose of the Policy

This Code exists because trust is the currency of financial services. CABS's reputation, and its licence to operate depends on every individual associated with the Bank acting ethically, honestly, and in the best interests of clients, stakeholders, and the institution. The Code provides the clarity of expectation that makes this possible, and the mechanisms to hold individuals accountable when standards are not met.

The Code achieves this by clearly defining the ethical standards expected of all employees and associated persons, integrating those standards into decision-making and business operations, and establishing a structured approach to monitoring, reporting, and remediating ethical breaches in an environment where concerns can be raised without fear of retaliation.

Type:	Policy Summary
Name:	Conflict of Interest & Gift Policy
Key search terms:	Conflict of Interest / Gifts / Hospitality / Ethics / Disclosure / Conduct Risk

1. Policy Statement

The Bank commits to ensuring that all business decisions are made with objectivity, transparency, and in the best interests of CABS and its stakeholders. We shall not permit personal interests, relationships, or the exchange of gifts and hospitality to compromise the integrity of business decisions or create undue obligations.

CABS has zero tolerance for undisclosed or improperly managed conflicts of interest. We commit to establishing and maintaining clear processes for the timely identification, disclosure, recording, and management of actual, potential, or perceived conflicts of interest. The Bank further commits to ensuring that the giving and receiving of gifts and hospitality is governed by transparent, consistent standards that prevent improper influence or bias in any form.

2. Purpose of the Policy

This Policy exists to protect the integrity of the Bank's decision-making and to preserve stakeholder trust. Conflicts of interest when left unmanaged distort judgement, create legal and regulatory exposure, and undermine the fairness and objectivity that clients and partners expect from a financial institution. By establishing a structured framework for conflict disclosure and management, the Bank ensures that its people are empowered to act in CABS's best interests at all times.

The Policy achieves this by requiring proactive disclosure and recording of conflicts, providing a clear process for assessing and managing them, and regulating gifts and hospitality to ensure all interactions with third parties remain transparent, appropriate, and free from undue influence.

Type:	Policy Summary
Name:	CABS Compliance Charter
Key search terms:	Compliance / Governance / Regulation / Oversight / Risk Management

1. Policy Statement

The Bank commits to governing, managing, and embedding compliance as a core institutional discipline across the organisation. The CABS Compliance Charter establishes the overarching framework through which compliance risk is identified, managed, and overseen, and defines the authority, independence, and role of the Compliance Function within CABS's governance structure.

We shall maintain a strong culture of integrity, accountability, and ethical conduct at every level of the organisation. The Bank commits to ensuring that compliance considerations are integrated into all business processes and decision-making activities, and that the Compliance Function operates with the independence and authority necessary to fulfil its mandate without impediment.

2. Purpose of the Policy

The Compliance Charter exists to provide the institutional clarity and authority necessary for effective compliance governance. Without a clearly defined compliance framework, one that establishes roles, reporting lines, and decision-making authority, regulatory risks go undetected, accountability is diffuse, and the organisation is exposed to avoidable harm. The Charter ensures that compliance is not a peripheral function but a central, empowered component of the Bank's governance architecture.

The Charter achieves this by defining the scope, authority, and independence of the Compliance Function; establishing clear governance and escalation structures; ensuring proactive identification and management of compliance risks; and supporting a culture where all employees understand their regulatory obligations and fulfil them consistently.

Type:	Policy Summary
Name:	CABS Compliance Mandate
Key search terms:	Compliance / Regulatory Risk / Monitoring / Advisory / Governance

1. Policy Statement

The Bank commits to maintaining an independent and effective Compliance Function that operates with clearly defined authority, adequate resources, and unrestricted access to information. The CABS Compliance Mandate establishes the scope of the Compliance Function and directs the implementation of compliance programmes that protect the organisation from regulatory risk.

We shall ensure that compliance is not a reactive discipline but a proactive, risk-based capability embedded across the organisation. The Bank commits to continuous improvement in compliance practices, ensuring that regulatory risks are identified early, assessed rigorously, and addressed in a timely manner to safeguard the institution's reputation and operational integrity.

2. Purpose of the Policy

This Mandate exists to give the Compliance Function the operational clarity and institutional standing it needs to be effective. Compliance without authority is compliance in name only; without a defined mandate, the function cannot fulfil its protective role. The Mandate ensures that compliance activities are structured, resourced, and empowered to influence the decisions and behaviours that create regulatory risk.

The Mandate achieves this by clearly defining the roles, responsibilities, and authority of the Compliance Function; directing the implementation of risk assessments, advisory services, monitoring activities, and regulatory reporting; and establishing the governance mechanisms through which compliance performance is evaluated and continuously improved across the organisation.

Type:	Policy Summary
Name:	CABS Data Protection Policy
Key search terms:	Privacy / Confidentiality / Data Security / Regulatory Compliance / Data Breach

1. Policy Statement

The Bank commits to protecting the privacy, confidentiality, and integrity of all personal and sensitive information in its custody. Data protection is not simply a regulatory obligation, it is a fundamental expression of the respect CABS holds for its clients, employees, and stakeholders, and a cornerstone of the trust upon which the Bank's relationships are built.

We shall process all personal data lawfully, fairly, and securely, in accordance with applicable data protection laws and industry best practices. The Bank commits to accountability and transparency in all data handling activities, and to ensuring that any breach of data security is identified, contained, and remediated with urgency.

2. Purpose of the Policy

This Policy exists because the mishandling of personal data causes real and lasting harm to individuals whose information is compromised, and to the institution whose negligence is exposed. In an environment of increasing regulatory scrutiny and sophisticated cyber threats, data protection must be a proactive discipline, not a reactive one. By establishing clear, consistent standards for data governance, the Bank ensures it honours its obligations to data subjects and regulators alike.

The Policy achieves this by mandating responsible data collection, processing, storage, and sharing practices; establishing accountability and governance structures for data protection; ensuring the rights of data subjects are respected and protected; and embedding privacy and security considerations into the Bank's operations, systems, and strategic initiatives.

Type:	Policy Summary
Name:	CABS Environmental Health and Safety Policy
Key search terms:	Workplace Safety / Environmental Protection / Risk Management / Occupational Health / Regulatory Compliance

1. Policy Statement

The Bank commits to providing a safe, healthy, and environmentally responsible working environment for all employees, contractors, visitors, and stakeholders. The protection of human life and the stewardship of the environment are non-negotiable principles that underpin the Bank's operations.

We shall comply with all applicable environmental, health, and safety legislation and maintain standards that meet or exceed regulatory requirements. The Bank commits to fostering a proactive safety culture in which hazards are identified and eliminated before harm occurs, environmental impacts are minimised, and continuous improvement in EHS performance is a shared institutional objective.

2. Purpose of the Policy

This Policy exists because the wellbeing of people and the protection of the environment are responsibilities that no responsible institution can delegate or defer. Workplace incidents, health failures, and environmental damage carry human, financial, and reputational costs that are entirely preventable through good governance and disciplined risk management. By embedding EHS standards into operational practice, the Bank ensures it fulfils its duty of care to everyone who works in or interacts with its environment.

The Policy achieves this by establishing minimum standards for health, safety, and environmental management; requiring proactive hazard identification, risk assessment, and incident reporting; ensuring compliance with applicable legislation; and promoting a culture of continuous learning and improvement in EHS practices across all business areas.

Type:	Policy Summary
Name:	CABS Environmental Social Governance Policy
Key search terms:	Sustainability / Environmental Management / Social Responsibility / Governance / Ethical Leadership

1. Policy Statement

The Bank commits to integrating environmental stewardship, social responsibility, and strong governance into all aspects of its operations, decision-making, and business strategy. CABS regards ESG not as a reporting obligation but as a core dimension of responsible institutional conduct and long-term value creation.

We shall embed ESG principles into our lending, investment, and operational decisions; promote ethical leadership, transparency, and accountability across the organisation; and actively manage the environmental and societal impacts of our business activities. The Bank commits to maintaining its reputation as a trusted and responsible financial institution by ensuring ESG considerations inform how we do business, not merely what we report.

2. Purpose of the Policy

This Policy exists because the financial sector has a material influence on environmental outcomes, social equity, and governance standards. CABS operates within, and is accountable to, the communities and ecosystems it serves. By systematically integrating ESG considerations into its risk management and business processes, the Bank ensures it creates long-term value sustainably, manages ESG-related risks before they escalate, and meets the growing expectations of regulators, investors, and stakeholders.

The Policy achieves this by establishing principles for environmental stewardship and climate risk management; promoting social inclusion, diversity, and community engagement; embedding governance and ethical standards across all business activities; and ensuring that ESG performance is monitored, reported, and continuously improved in line with international best practices and applicable regulatory requirements.

Type:	Policy Summary
Name:	CABS Financial Crime Risk Policy
Key search terms:	Financial Crime / Bribery & Corruption / Fraud / Protected Disclosures / Regulatory Compliance

1. Policy Statement

The Bank commits to preventing, detecting, and managing financial crime in all its forms, including bribery, corruption, money laundering, and fraud. CABS has zero tolerance for financial crime and holds all employees, associated persons, contractors, and third parties to the highest standards of integrity, honesty, and accountability in all business activities.

We shall maintain a comprehensive financial crime risk management framework that is adequate in scope, robust in design, and consistently applied across the organisation. This Policy is subordinate to the CABS Operational Risk Policy and forms part of the OML Group Governance Framework. The Bank commits to vigilance, transparency, and continuous improvement in its financial crime controls ensuring that the organisation remains resilient against the full spectrum of financial crime threats.

2. Purpose of the Policy

This Policy exists because financial crime poses an existential threat to institutional integrity. Money laundering, fraud, bribery, and corruption do not merely result in financial loss, they corrode trust, attract regulatory sanction, and compromise the Bank's ability to serve its clients responsibly. By establishing a CABS-wide framework for managing financial crime risk, the Bank ensures it can identify threats early, respond decisively, and protect its stakeholders from harm.

The Policy achieves this by clearly defining roles and responsibilities for financial crime risk management; mandating effective monitoring, reporting, and escalation mechanisms; requiring timely remediation of identified risks; and fostering a culture in which all employees understand their obligation to act ethically and legally, and to speak up when they do not.

Type:	Policy Summary
Name:	CABS Fit and Proper Policy
Key search terms:	Fit and Proper Assessment, Key Roles Evaluation, Employee Integrity, Regulatory Compliance, Ethical Conduct, Appointment Criteria

1. Policy Statement

The Bank commits to ensuring that all individuals occupying key governance, management, and critical operational roles within CABS are suitable, competent, and of high ethical standing. Sound governance begins with the right people and CABS is committed to the disciplined assessment of fitness and propriety as a cornerstone of institutional integrity.

We shall apply consistent, transparent criteria for the assessment of directors, senior management, and key personnel, both at the point of appointment and on an ongoing basis. The Bank commits to compliance with all applicable regulatory requirements governing the fitness and propriety of key individuals, and to taking prompt corrective action where standards are not met.

2. Purpose of the Policy

This Policy exists because the quality of people in positions of authority and trust directly determines the quality of the institution's governance, decisions, and conduct. Appointing or retaining individuals who lack the necessary integrity, competence, or regulatory standing creates systemic risk — to the Bank, its clients, and the broader financial system. By establishing a standardised framework for fitness and propriety assessments, the Bank ensures that those entrusted with its governance and operations are genuinely worthy of that trust.

The Policy achieves this by defining clear and consistent criteria for assessing suitability; establishing transparent processes for appointments, reappointments, and ongoing reviews; ensuring timely identification and remediation of fitness concerns; and maintaining full alignment with regulatory expectations on the standards required of individuals in key roles.

Type:	Policy Summary
Name:	CABS Investment Banking Policy and Mandate
Key search terms:	Investment Banking, Advisory Services, Capital Raising, Financial Transactions, Risk Management, Governance, Compliance, Ethical Conduct, Strategic Alignment, Regulatory Requirements

1. Policy Statement

The Bank commits to conducting all investment banking activities, including advisory services, capital raising, and financial transactions, with the highest standards of prudence, transparency, and regulatory compliance. CABS ensures that all investment banking operations are aligned with the organisation's risk appetite, strategic objectives, and governance framework.

We shall maintain robust governance and risk management standards for all investment banking activities, ensuring that permissible activities are clearly defined, that employees operate within those boundaries, and that all transactions are executed with integrity and in the best interests of clients and stakeholders.

2. Purpose of the Policy

This Policy exists to ensure that CABS's investment banking activities create value without creating unacceptable risk. Investment banking operations, by their nature, carry significant financial, reputational, and regulatory exposure. Without clear governance standards and defined boundaries, those risks can escalate rapidly. By establishing a structured framework for managing investment banking risk, the Bank ensures that these activities are conducted responsibly and in alignment with its institutional values.

The Policy achieves this by defining the scope of permissible investment banking activities; establishing governance and risk management standards for their execution; ensuring prudent decision-making, effective monitoring, and transparent reporting; and minimising operational, financial, and reputational risk through disciplined oversight and continuous improvement of controls.

Type:	Policy Summary
Name:	Maadili Charter
Key search terms:	Ethics / Conduct / Corporate Culture / Anti-Bribery / Financial Crime / Customer Fairness / Compliance

1. Policy Statement

The Bank commits to fostering an ethical culture as a core and non-negotiable element of responsible business conduct. The Maadili Charter, is CABS's formal code of ethics and the Bank commits to upholding its principles in all personal, business, and client-related activities at every level of the organisation.

We shall hold all employees, directors, contractors, and associated persons to the behavioural standards set out in the Charter. The Bank commits to zero tolerance for illegal, unethical, or dishonest behaviour, and to ensuring that the Charter is actively reinforced through governance, training, and accountability mechanisms not merely published as a statement of intent.

2. Purpose of the Policy

The Maadili Charter exists because ethical culture cannot be assumed, it must be built, maintained, and actively defended. In financial services, ethical failures carry consequences that extend far beyond the institution: they harm clients, erode public confidence, and invite regulatory intervention. The Charter provides the organisation-wide standard that makes ethical expectations explicit, and the mechanisms that make accountability real.

The Charter achieves this by clearly defining expected standards of behaviour across areas including customer fairness, conflicts of interest, financial crime, anti-money laundering, bribery, and social media conduct; embedding those standards into decision-making and operations; and establishing structured processes for reporting, escalation, investigation, and remediation of ethical breaches in an environment that protects those who speak up.

Type:	Policy Summary
Name:	CABS Market Conduct Risk Policy
Key search terms:	Market Conduct, Conduct Risk, Stakeholder Harm, Ethical Decision-Making, Governance, Risk Management, Compliance, Operational Oversight, Accountability, Transparency

1. Policy Statement

The Bank commits to managing the risk that its decisions and actions may cause harm to customers, employees, the Society, shareholders, or the market in which it operates. CABS recognises that market conduct risk arises when insufficient consideration is given to the real-world outcomes of business strategies and their execution on the stakeholders to whom the Bank owes obligations.

We shall embed a culture of ethical and responsible decision-making across all levels of the organisation. The Bank commits to ensuring that both the immediate and long-term consequences of business actions are considered and that all employees act with integrity, fairness, and accountability in protecting the interests of stakeholders and the reputation of the institution.

2. Purpose of the Policy

This Policy exists to ensure that CABS's pursuit of business objectives never comes at the expense of the people and markets it serves. Conduct failures, whether arising from misaligned incentives, inadequate oversight, or poor judgement, attracts regulatory sanctions, and undermines the trust that is the foundation of financial services. By establishing a structured framework for identifying, assessing, and managing conduct risk, the Bank ensures that responsible business practice is an operational standard, not an aspiration.

The Policy achieves this by requiring employees at all levels to evaluate the short, medium, and long-term consequences of their business decisions; establishing governance structures and oversight mechanisms to monitor conduct risk; and ensuring that deficiencies are identified through regular reporting and key risk indicators, and addressed promptly through continuous improvement of controls.